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VIA CM/ECF

The Honorable Cathy L. Waldor
United States District Judge for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Gorbaty v. Mitchell Hamline School of Law
Court File No. 2:18-cv-16691-ES-CLW

Dear Magistrate Judge Waldor:

Pursuant to the District's Local Rules, as well as the Court's Civil Case Management Order, I am writing to request a telephone conference to discuss Defendant Mitchell Hamline School of Law's request that the Court stay discovery in the above-referenced proceeding pending resolution of the school's motion to dismiss.

While Mitchell Hamline will present its rationale on a telephone conference with the Court, the school's request is made in part because of the events that occurred at the recent settlement conference. What is more, a discovery stay will allow both parties to preserve resources pending a dispositive motion. Without such a stay, the parties may spend significant resources on drafting and responding to written discovery, arguing motions relating to the scope of discovery, and preparing for and taking depositions, all before it is decided whether the Court has jurisdiction over Mitchell Hamline and, if so, whether Plaintiff has asserted claims upon which relief can be granted.

We have conferred with Plaintiff's counsel, Chris Luongo, regarding this request. Mr. Luongo will not be joining the Mitchell Hamline's motion to stay discovery. He advised that he has not yet spoken with his client about it and, therefore, has not yet determined whether he will oppose the motion.

Respectfully submitted,

s/ Suzanne Herrmann Brock
Suzanne Herrmann Brock

cc: All Counsel of Record (via ECF)